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SWIDLER BERLIN SHEREFF FRIEDMAN, LLP

THE WASHINGTON HARBOUR
3000 K STREET, NW, SUITE 300
WASHINGTON, DC 20007-5116
TELEPHONE (202) 424-7500
FACSIMILE
WWW.SWIDLAW.COM

HARISHA J. BASTIAMPILLAI
DIRECT DIAL: (202) 424-7869
FAX: (202) 424-7643
HJBASTIAMPILLAI@SWIDLAW.COM

NEW YORK OFFICE
THE CHRYSLER BUILDING
405 LEXINGTON AVENUE
NEW YORK, NY 10174
TEL (212) 973-0111
FAX (212) 891-9598

November 8, 2002

EX PARTE OR LATE FILED

BY ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Telecommunications Relay Services and Speech-to-Speech Services for
individuals with Hearing and Speech Disabilities, CC Docket No. 98-67
Ex Parte Filing*

Dear Ms. Dortch:

In ~~this~~ letter, Telecommunications for the Deaf, Inc. ("TDI") asks the Commission to implement a national outreach program in regard to telecommunications relay services ("TRS"). TDI is a national advocacy organization actively engaged in representing the interests of the twenty-eight million Americans who are deaf, hard of hearing, late-deafened, and deaf-blind. TDI's mission is to promote equal access to broadband, media and tele-communications for the aforementioned constituency groups through consumer education and involvement, technical assistance and consulting, application of existing and emerging technologies, networking and collaboration, uniformity of standards and national policy development and advocacy.

Two and a half years ago, this Commission sought comment on its tentative conclusion that TRS service would be improved with a nationwide awareness campaign. The record elicited in this proceeding has demonstrated that a national outreach campaign would not only improve TRS, but is vital to promoting the goals of Section 225 of the Communications Act. The intervening two years has not diminished the need for increased outreach and training, and, in fact, has demonstrated a heightened need for such efforts. In this letter, TDI will demonstrate why the Commission must promptly implement such an outreach program.

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The Case for a National Outreach Program Two Years Ago

In March 2000, this Commission tentatively concluded that TRS service would be "improved with a nationwide awareness campaign that would reach the groups suggested by the commenters – all potential TRS users, consumers with disabilities, senior citizens who have lost their hearing late in life, potential users, and the general public." The Commission sought comment on the need for an outreach program based on the lengthy comments from several pruders on the need for an outreach program in response to the initial NPRM in this proceeding.¹ This response was all the more significant given the fact that the Commission did not seek comment on the outreach issue.

The response convinced the Commission that its current rule, which called for carriers to promote awareness of TRS through periodic bill inserts, placement of TRS instructions in telephone directories, directory assistance services, and incorporation of TTY numbers in telephone directories, "has not effectively ensured that callers are aware of TRS, and the lack of awareness adversely affects the quality of TRS."² The commenters had noted that TRS users were finding it difficult to communicate with called parties who were unaware of the existence of TRS, were uncomfortable using TRS, or were unwilling to use TRS. As a result there were an alarming number of hang-ups by people receiving TRS calls. In addition, many employment opportunities were not extended to individuals with hearing disabilities because employers were uncomfortable using TRS for business transactions.⁴

In response the Commission clarified that:

[t]he current rule obligates carriers to assure that "callers" in their service areas are aware of TRS. The term "callers" refers to the general public, not just consumers with speech and hearing disabilities. It is crucial for everyone to be aware of the availability of TRS for it to offer the functional equivalence required by the statute. As Congress has stated, TRS was designed to help bridge the gap between people with hearing and speech disabilities and people without such disabilities with respect to telecommunications services. The lack of public awareness prevents TRS from achieving this Congressionally mandated objective. We also note that, as we have determined that TRS includes services other than traditional TTY-based relay service, outreach efforts should now include information about those relay services as well.⁵

¹ In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CC Docket No. 98-67, Report and Order and Further Notice of Proposed Rulemaking, FCC 00-56, ¶ 134 (March 5, 2000) ("TRS FNPRM").

² In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CC Docket No. 98-67, Notice of Proposed Rulemaking (1998) ("TRS NPRM").

³ TRS FNPRM at ¶ 104.

⁴ TRS FNPRM at ¶ 144.

⁵ TRS FNPRM at ¶ 105.

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As a way of bridging the gap between people with hearing and speech disabilities and people without such disabilities in regard to telecommunications services, the Commission, as noted above, sought comment on a nationwide outreach program to promote awareness of TRS. The Commission sought comment on whether funding for this program should come from the interstate TRS fund and whether the interstate TRS fund administrator should administer the funding for the outreach programs! The Commission also proposed to amend the mission of the Interstate TRS Fund Advisory Council to include establishing guidelines and a procedure to fund the coordinated national outreach campaign? The Commission's enthusiasm for such an endeavor was fueled by the tremendous success of a TRS advertising campaign in Maryland. As a result of the Maryland campaign, public awareness of TRS was at an all-time high, telephone inquiries about the TRS program increased dramatically, and call volumes to the relay center increased.⁶

Thus, two years ago the Commission was on the cusp of implementing a national outreach program. TDI strongly supported the use of a national outreach campaign at the time. TDI noted that "without widespread knowledge and appreciation of TRS, improving the ability of TRS users and potential users to communicate will be that much more difficult."⁷ TDI noted that awareness would be a good first step in remedying some of the existing problems with TRS. TDI observed that "the economies of scale available to a national campaign would provide access to untapped media outlets, which in turn should increase usage and ultimately the quality of TRS."¹⁰

The Need for a National Outreach Program Today

The Commission, while it has engaged in discrete outreach programs such as promoting 711 access to TRS,¹¹ has yet to implement a comprehensive national outreach program that can bridge the communications gap. The intervening two years has only heightened the need for such a program. Although many of the problems that TDI documented in regard to TRS have been alleviated by the introduction of new technology and creation of service quality standards by the Commission, many potential users are not aware of these improvements.

The Commission noted in its 2000 FNPRM that it sought to "improve the quality of traditional relay services and lead to the widespread establishment of new types of relay services."¹² The last two years has seen the Commission experience success in both regards. Developments in technology continue to lead to the development of new TRS services. For instance, carriers such as WorldCom and AT&T have started to utilize IP telephony in their

⁶ TRS FNPRM at ¶ 134.

⁷ TRS FNPRM at ¶ 134.

⁸ TRS FNPRM at ¶ 134.

⁹ CC Docket No. 98-67, Comments of Telecommunications for the Deaf, Inc. (May 5, 2000)

¹⁰ TDI May 5, 2000 Comments at 4.

¹¹ Kaye Snowden, *October 1st - A New Day for TRS Access*, Enabled Online (Oct. 1, 2001).

¹² TRS FNPRM at ¶ 132.

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provision of TRS.¹³ As a result, users are able to make relay calls over the Internet and this allows them to make calls from more locations.

The development of video relay services ("VRS ") also has provided much promise. The technology benefits not only those who primarily communicate through American Sign Language but also those who rely on speechreading.¹⁴ As more users see their bandwidth capabilities increase, the use of VRS will increase as well. Conversations via VRS occur naturally in both pace and form in comparison to traditional TRS conversations, and the amount of time required to interpret words and phrases is significantly reduced." As TDI noted "VRS is the next step in the convergence of the latest technological advances in communication" and one day relay services "will be coupled up, offering audio, video and text services in the same package."¹⁶

The Commission has also implemented national service quality standards that have furthered the goal of functional equivalence. The Commission modified speed of answer requirements, imposed minimum typing speeds for communication assistants, and established minimum time periods that a communications assistant ("CA") must stay with a call.¹⁷

As a result of these technological advancements and service quality improvements, the TRS of today is significantly improved compared to the TRS of a few years ago. Many of the problems noted by TDI two years ago have been partly, if not completely, alleviated. Problems cited by TDI at that time included slowness of typed transmission of spoken words, inability to speak at a normal pace, inability to inject thoughts spontaneously, and gaps of silence for the hearing party while waiting for a response.

These promising developments, however, do not obviate the need for a national outreach program. In fact, they heighten the need for such a program. Many potential users of TRS are not aware of these developments. They are under the impression that TRS of old is still in place. Many potential users are repelled by thoughts of gaps of silence and slow transmission. Thus, while the goal of functional equivalence is being increasingly realized on a technological and service quality basis, many potential users still operate under the impression of functional disparity for TRS and avoid using it. Until this gap in perception is bridged, true functional equivalence will not be realized. As the Commission has noted, "the ever-increasing availability of new services and the development of new technologies continually challenge us to determine what specific services and performance standards are necessary to ensure that TRS is functionally equivalent to voice telephone service."¹⁸ The Commission must remember that part of this challenge is to ensure that the public knows about new services and new technologies and the improvements effected by these developments.

¹³ CC Docket No. 98-67. Comments of Telecommunications for the Deaf, Inc. at 2 (July 30, 2001).

¹⁴ CC Docket No. 9847, Comments of Telecommunications for the Deaf, Inc. at 2 (September 14, 2001).

¹⁵ *Id.* at 4.

¹⁶ *Id.* at 6.

¹⁷ TRS FNPRM at ¶ 9.

¹⁸ TRS FNPRM at ¶ 4.

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The value of effective outreach cannot be denied. The Maryland experience was referenced above. An outreach effort in California enabled California to raise its monthly STS outbound call volume from 2,000 to 3,000 calls in 18 months.¹⁹ The volume of calls increased and the length of calls decreased as users became more familiar and comfortable with speech to speech relay service ("STS").²⁰ In Minnesota, outreach and training efforts pushed call volume over 500 calls in three months while some states without outreach programs have fewer than 50 calls per month after several years of service.²¹ Implementing new services, without more, will not bridge the communications divide. As Commissioner Copps noted on the date nationwide 711 access was implemented:

[W]hile today marks a step forward, we must not rest on our accomplishments. We must also establish public-private partnerships to publicize the availability of 711 and to increase awareness of Telecommunications Services generally. And we must continue to expand access to communications technology, including advanced telecommunications, for those with disabilities. We must all do what we can to attain Congress' vision that those with disabilities have access to functionally equivalent services so that these citizens can participate fully in our society.²²

To achieve true functional equivalency, the Commission must not only strive to improve TRS, but also must promote its use. A mere month after Maryland implemented its 711 program, TRS call volume increased by over 13% for calls placed by deaf, hard of hearing, and speech disabled individuals, and by over 23% for TRS calls initiated by individuals making voice calls.²³ This increase was due in no small part to the public relations and education campaign conducted by the Maryland Relay program. For instance, the program implemented a "relay partner" program encouraging businesses to advertise the program by incorporating a special relay access logo in their advertising, signage and marketing programs.²⁴

Components of a National Outreach Program

If the Commission does embark on a national outreach program, there are a few steps the Commission should undertake to ensure it will be effective. One, the Commission should measure the public's awareness of TRS services prior to the initiation of the program to establish a baseline by which to assess the effectiveness of the program. The Commission should also compile and publish call volume data.²⁵ Second, the Commission should consult with representatives of the TRS user community to determine the proper goals of a national outreach

¹⁹ See <http://www.sfnnews.com/Pages/BSegalmanOutreachPlan.html>

²⁰ TRS FNPRM at ¶ 18.

²¹ See <http://www.sfnnews.com/Pages/BSegalmanOutreachPlan.html>

²² Commissioner Copps Applauds Nationwide 711 for Telecommunications Relay Services, FCC Press Release at 1 (October 1, 2001).

²³ In the Matter of the Use of N11 Codes and Other Abbreviated Dialing Arrangements, CC Docket No. 92-105, Remarks of Telecommunications for the Deaf Inc. at the FCC 7-1-1 Forum at 2 (Sept. 7, 1999).

²⁴ Id.

²⁵ TDI May 5, 2000 Comments at 6.

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program and the best way to achieve the **goals**. Third, the Commission should encourage "the **simultaneous** and independent formation of state-level advisory **mechanisms** supported by intrastate telecommunications funding for the twin goals of increasing awareness and education."²⁶

The interstate TRS Fund, managed by NECA, is a logical and appropriate mechanism for funding a national outreach campaign. The interstate TRS Fund has an established organization and structure for controlling TRS monies and can be readily modified to accommodate this outreach program. Moreover, vendors and telecommunications carriers already are familiar with the relevant reimbursement and contribution processes. Directing the national outreach campaign through the TRS Fund Administration will obtain these same efficiencies. Modifying the existing TRS Fund and Administration to serve as a repository for national outreach monies will minimize the creation of parallel and redundant bureaucracies and use the expertise at hand. Importantly, adequate funds should be earmarked expressly for outreach efforts, not commingled in a general account. To do otherwise would risk creating a hollow mandate or siphoning/diverting funds from one program at the expense of the other.

The Interstate TRS Fund Advisory Council must be charged with the mission of education and outreach. To effectively accomplish their mission, the TRS Fund Advisory Council, with input from all stakeholders, must be imbued with sufficient authority to establish outreach guidelines and procedures, to develop and direct public relations, marketing and education programs, and to evaluate the quality of outreach. TDI encourages the inclusion of TRS users in an advisory role because they have a better understanding of capabilities and shortcomings within the relay programs. The contributions of such ready experts should not be overlooked.

The Particular Case for STS Outreach

The need for, and the tangible benefits that would arise from, a national outreach program is vividly demonstrated in regard to Speech-to-Speech Relay Services ("STS"). STS involves the use of specially-trained communications assistants ("CA") who understand the speech patterns of persons with speech disabilities and can repeat the words spoken. The availability of STS gives persons with speech disabilities an efficient alternative to using a TTY, which requires the use of TTY hardware and which can be a cumbersome form of conversation given the typing involved.²⁷ For instance, many people with speech disabilities may also have physical disabilities that make use of a TTY difficult or impossible.²⁸ For some people STS provides the first opportunity to use telecommunications services independently.²⁹ The Commission anticipated that STS will be "especially valuable to individuals with cerebral palsy, Parkinson's disease, laryngectomies, Alzheimer's disease, stuttering, muscular dystrophy, stroke, and other conditions affecting loudness or clarity of speech."³⁰

²⁶

Id

²⁷

TRS FNPRM at ¶ 14.

²⁸

TRS FNPRM at ¶ 16.

²⁹

TRS FNPRM at ¶ 18.

³⁰

Two Major FCC Consumer Initiatives to Begin March 1, FCC Press Release at 1 (Feb. 28, 2001).

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The Commission has determined that STS services fall within the scope of Section 225's definition of TRS.³¹ Starting March 1, 2001, carriers were required to provide STS.³² The Commission noted that "STS will help break the insularity barriers that confine members of the community of people with speech disabilities and offer them opportunities for education, employment, and other, more intangible benefits (freedom, joy, self-reliance) that are concomitant with independence."³³

The Commission has stated that "use of STS will increase with aggressive outreach efforts to the nation's 2.7 million citizens with speech disabilities."³⁴ The limited use of STS to date suggests that the current outreach efforts have not been successful. Current call volumes are limited and seem to be concentrated primarily in a few states.³⁵

In addition to the low volumes, there appear to be significant quality of service issues as well. Some CAs have inadequate training. Many STS services do not provide adequate amplification so users with voice disabilities cannot be heard. Users with mild hearing disabilities cannot hear the CAs. There are also problems with dialect as many CAs have different dialects than the regions that they serve. For instance, Virginia CAs serve Hawaiian areas.³⁶

Many of the people with speech disabilities have other disabilities as well that may preclude their ability to advocate for improvements to STS. Thus a vicious cycle is created in that those who need the service the most are limited in their ability to lobby for quality service. The Commission has left it to the states to identify and train users of STS, but only a few states have established STS training programs.

Education and outreach can go a long way to addressing some of these issues and would not require a substantial amount of resources. Minnesota has an effective program for STS that only costs \$110,000 annually. Thus, application of a national program for STS outreach in the fifty states and the District of Columbia would only cost \$5.6 million. Actually the efficiency inherent to a national effort may push this figure downward. In 2001, approximately \$5.5 million was included as a line item in the NECA Interstate TRS Fund to pay for a national outreach campaign. Apparently NECA waited for guidelines from the Commission on expenditure of that money, but was informed by the Commission that the Commission was not close to establishing such a campaign. Thus, the money set aside for outreach was used to reduce funding requirements for the next year. Thus, it is eminently feasible to finance a

³¹ TRS FNPRM at ¶ 14.

³² Two Major FCC Consumer Initiatives to Begin March 1, FCC Press Release at 1 (Feb. 28, 2001).

³³ TRS FNPRM at ¶ 16, citing Ms. Keller Reply Comments at 4.

³⁴ TRS FNPRM at ¶ 18.

³⁵ See CC Docket No. 98-67, Comments of Dr. Bob Segalman on Speech to Speech (August 17, 2002).

Review of monthly outbound STS call volumes show ballpark figures for California (6,000), Maryland (500), Minnesota (1,000) and Washington (400). There are about 500 users nationally with a potential of 500,000 users.

³⁶ *Id.*

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national outreach campaign and the Commission should designate that funds be appropriated for use in establishing the national outreach campaign.

While this amount would not be sufficient to alleviate the current problems with STS, it will create more users who can then advocate on a state level for more funds. Thus, the quest for improved STS can build upon itself. All that is needed is for the Commission to start the ball rolling. The history of TRS has demonstrated that advertising and training can go a long way to making functional equivalence a reality. A national advertising campaign in concert with state training programs would most definitely lead to a more viable STS service. Clearly the call volumes for STS to date indicate that many are unaware of this service. STS users will also need more one-to-one counseling and training as many potential users are not familiar with telephones and thus may be wary of its use. STS outreach programs can be modeled on successful programs implemented in California, Minnesota and Washington.³⁷ STS outreach should be a significant component of a national TRS outreach program.

Coin Sent-Paid Order Demonstrates the Importance of Outreach

The Commission recently issued a ruling on coin sent-paid call requirements for TRS providers.³⁸ In that order, the Commission noted the tremendous value of outreach programs in the context of communicating awareness regarding completing TRS calls from payphones. The Commission stated that "we continue to believe that extensive outreach programs are necessary and appropriate to expand consumer awareness about making TRS calls from payphones."³⁹ The Commission observed that over the past few years, TRS consumers and industry members have reached consensus on the types of outreach and education that can be effective for this purpose, and that several measures have already been implemented by carriers. The Commission noted, however, that "implementation of the current educational and outreach programs have not been sufficient."⁴⁰ The Commission encouraged carriers to continue to develop programs to educate users about making calls via payphones and stated that such outreach "is an essential element of the continued success of the TRS programs."⁴¹ The Commission, while it did not mandate outreach programs, noted that if it found that "consumers are not receiving adequate outreach and education about TRS payphone calls," it would "consider whether some or all of the recommended measures should become mandatory requirements."⁴²

The principles espoused by the Commission in regard to outreach for payphone calls apply to TRS calls in general. Extensive outreach programs are essential to expanding consumer awareness about TRS calls. Likewise, as noted above, current educational and outreach programs have not been sufficient. TDI urges the Commission to place the same emphasis, if not more emphasis, on outreach for TRS in general as it has for TRS calls via payphones. TDI is

³⁷ See <http://www.stsnews.com/Pages/BSevalmanOutreachPlan.html>

³⁸ In the Matter of Telecommunications Relay Services and the Americans With Disabilities Act of 1990, CC Docket No. 95571, Fifth Report and Order. FCC 02-269 (Oct. 25, 2002) ("Coin Sent-Paid Order").

³⁹ Coin Sent-Paid Order, ¶ 28.

⁴⁰ Coin Sent-Paid Order, ¶ 28.

⁴¹ Coin Sent-Paid Order, ¶ 28.

⁴² Coin Sent-Paid Order, ¶ 28.

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concerned, however, that the Commission's encouragement of voluntary programs implemented by carriers will not be sufficient to effect meaningful outreach. While TDI is appreciative of voluntary outreach efforts to date, such efforts, as demonstrated above, clearly have not been sufficient. The commission needs to take a more active role in facilitating outreach.

Leaving the implementation of an outreach program to individual carriers will not create the national outreach program that is needed to promote TRS awareness. First, there is no guarantee that all carriers will place the same emphasis on outreach. Given the present financial circumstances, some carriers may place outreach lower on its list of priorities. Second, implementation of outreach on carrier-by-carrier basis will provide less uniformity. Areas served by certain carriers may have meaningful outreach while other areas do not. All areas of the country need to be able to reap the benefits of increased outreach and training. Third, it is hard to monitor outreach success on a carrier-by-carrier basis. It may be hard to discern carrier efforts in this regard without some type of reporting requirement which will increase the workload and expense for all concerned. It is a lot easier to monitor the extent and success of outreach when it is monitored and directed through a national organization.

There are some positive steps taken by the Commission in regard to outreach in the payphone context that need to be established and expanded upon for TRS outreach in general. For instance, the consultations between the Industry Team and TRS consumers did help establish a meaningful blueprint for outreach. As TDI and the California PUC recommended, such consultations need to continue and should include appropriate state entities as well. Once again, a formal outreach program administered by a national entity can ensure that these consultations remain regular and substantive. The Commission found that continuing consultations would be "beneficial," but declined to implement a mechanism to ensure that the consultations will continue. The outreach program proposed by TDI under the aegis of Interstate TRS Fund Advisory Council would provide the mechanism needed to ensure that the public continues to reap the benefits of such consultative efforts,

commissioner Copps, in his statement attached to the *Coin-Sent Paid Order*, criticized the Commission for failing to require Educational efforts or outreach to ensure that consumers are aware of their options despite finding that current educational and outreach programs have not been sufficient! While Commissioner Copps was speaking specifically about TRS calls via payphones, his statements are applicable to the Commission's approach to TRS in general. The Commission has repeatedly espoused the many tangible benefits that increased outreach and training can provide, but has failed to put the mechanism in place to make these benefits a reality. The Commission can rectify this by acting swiftly to implement a national outreach program. Commissioner Copps noted that "[a]s technology advances, we should be moving forward on accessibility, not retreating."⁴⁵ Technology has truly advanced; the Commission now needs to establish increased outreach to ensure that TRS consumers are able to partake fully of these technological advances.

⁴³ See *Coin-Sent Paid Order*, ¶ 38.

⁴⁴ *Coin-Sent Paid Order*, Statement of Commissioner Michael J. Copps, Approving in Part, Dissenting in Part.

⁴⁵ *Id.*

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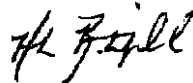
A Bridge Needs Users

Commissioner Copps recently noted that:

Facilitating access to quality relay services is one important step towards closing the communications divide for those with disabilities. Access to communications and information is the key to unlocking the doors of opportunity in this Information Age. We must make sure that those doors are open – and remain open – for all Americans. and not locked shut for some.⁴⁶

By facilitating technological developments and mandating service quality improvements, this Commission has done a laudable job in establishing a sound TRS program through continued efforts to bridge the communications divide for those with disabilities. Now the Commission must ensure that potential users and other Americans are aware of the existence and utility of TRS services. A national outreach program will inform all potential users of TRS of the availability of these improved services and provide them with the necessary training to use these services. In short, it is not enough to build the bridge, but the Commission must also encourage people to cross the bridge. Only then can a viable functional equivalence be effected. A national outreach program will greatly serve this end, and the Commission should begin implementing such a program.

Respectfully submitted,



Andrew D. Lipman
Paul O. Gagnier
Harisha J. Bastiampillai

Counsel for Telecommunications for the
Deaf, Inc.

Claude Stout, Executive Director
Telecommunications for the Deaf, Inc.
8630 Fenton Street, Suite 604
Silver Spring, MD 20910-3803

Cc: Susanna Zwerling, Media and Consumer Protection Legal
Advisor to Commissioner Copps
K. Dane Snowden, Chief Consumer & Governmental Affairs Bureau

⁴⁶ Commissioner Copps Applauds Nationwide 711 for Telecommunications Relay Services, FCC Press Release at 1 (Oct. 1, 2001).

CERTIFICATE OF SERVICE

I, **Harisha Bastiampillai**, hereby certify that on November 8, 2002, I caused to be served upon the following individuals the *Ex Parte* Letter of **Telecommunications** for the **Deaf, Inc.** in CC Docket No. 98-67.


Harisha Bastiampillai

Via ECFS:

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th street, S.W.
Washington, D.C. 20554

Via First Class Mail:

Qualex International
Portals 11
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Via First Class Mail:

K. Dane Snowden
Chief
Consumer & Governmental Affairs
Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Susanna Zwerling
Legal Advisor to Commissioner Copps
Federal Communications Commission
445 12th street S.W.
Washington, D.C. 20554